

CMR

21

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROGER COUSTRY, Derivatively On Behalf
of CIGNA CORPORATION,

Plaintiff,

vs.

H. EDWARD HANWAY, WILSON H.
TAYLOR, MICHAEL W. BELL, CHARLES
R. SHOEMATE, LOUIS W. SULLIVAN,
PETER N. LARSON, JOSEPH NEUBAUER,
HAROLD A. WAGNER, CAROL COX
WAIT, MARILYN WARE, JANE E.
HENNEY, FRED HASSAN, ALFRED C.
DeCRANE, JR. and ROBERT P. BAUMAN,

Defendants,

-and-

CIGNA CORPORATION, a Delaware
corporation,

Nominal Defendant.

Civ. Action No. 2:05cv853

Honorable Cynthia M. Rufe

FILED

JAN 10 2006

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

**STIPULATION OF VOLUNTARY DISMISSAL
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)**

WHEREAS, Plaintiff filed this action on February 24, 2005;

WHEREAS, Defendants filed a Motion to Dismiss the Verified Amended Shareholder
Derivative Complaint (the "Motion") on May 5, 2005;

WHEREAS, the Motion was fully briefed on September 28, 2005;

WHEREAS, Plaintiff, after reviewing Defendants' Motion, has decided to dismiss this action without prejudice;

WHEREAS, Plaintiff is submitting the declaration of Jeffrey P. Fink in support of this dismissal declaring that neither Plaintiff nor his counsel has received any consideration for this dismissal, and no future consideration has been promised; and

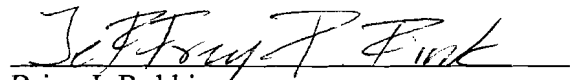
WHEREAS, this dismissal will not have any effect on the shareholders of CIGNA Corporation;

It is hereby stipulated and agreed by and between the parties hereto, subject to approval by the Court, as follows:

1. This action shall be dismissed without prejudice; and
2. Each party will bear its own costs.

DATED: January 6, 2006

ROBBINS UMEDA & FINK, LLP


Brian J. Robbins
Jeffrey P. Fink
610 W. Ash Street, Suite 1800
San Diego, CA 92101
Telephone: 619/525-3990
Facsimile: 619/525-3991

THE WEISER LAW FIRM, P.C.
Patricia C. Weiser (PA #78295)
Robert B. Weiser (PA #81575)
121 N. Wayne Avenue, Suite 100
Wayne, PA 19087
Telephone: 610/225-2677
Facsimile: 610/225-2678

Attorneys for Plaintiff

DATED: January 9, 2005

HARKINS CUNNINGHAM LLP

Eleanor Morris Illoyay

John G. Harkins, Jr.
Eleanor Morris Illoyay
2800 One Commerce Square
2005 Market Street
Philadelphia, PA 19103
Telephone: 215/851-6700
Facsimile: 215-851-6710

O'MELVENY & MYERS, LLP

Seth Aronson
Kristina Hersey
400 South Hope Street
Los Angeles, CA 90071
Telephone: 213/430-7486
Facsimile: 213/430-6407

Attorneys for defendants H. Edward
Hanway, Wilson H. Taylor, Michael W.
Bell, Charles R. Shoemate, Louis W.
Sullivan, Peter N. Larson, Joseph Neubauer,
Harold A. Wagner, Carol Cox Wait, Marilyn
Ware, Jane E. Henney, Fred Hassan, Alfred
C. Decrane, Jr., Robert P. Bauman and
nominal defendant CIGNA Corporation

SO ORDERED:

Cynthia M. Rufe

HONORABLE CYNTHIA M. RUFÉ
UNITED STATES DISTRICT JUDGE

DATED: Jan. 10, 2006

mailed
1-10-06
Aronson
Hersey
Weiser
Kilduff
Fink

Filed
1-10-06
Illoyay
Harkins

DOCKET TO STATS

corporation,

Nominal Defendant.

**DECLARATION OF JEFFREY P. FINK IN
SUPPORT OF THE STIPULATION OF VOLUNTARY DISMISSAL
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)**

I, JEFFREY P. FINK, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Robbins Umeda & Fink, LLP, one of the counsel

2:05-cv-00853-CMR

ELEANOR MORRIS ILLOWAY
HARKINS CUNNINGHAM LLP
2800 ONE COMMERCE SQUARE
2005 MARKET ST
PHILADELPHIA PA 19103

215-851-6710
emi@harkinscunningham.com

2:05-cv-00853-CMR

JOHN G. HARKINS
HARKINS CUNNINGHAM
2800 ONE COMMERCE SQUARE
2005 MARKET ST
PHILADELPHIA PA 19103-7042

215-851-6710
jharkins@harkinscunningham.com

***** -COMM. JOURNAL- ***** DATE JAN-10-2006 ***** TIME 11:38 *****

MODE = MEMORY TRANSMISSION

START=JAN-10 11:37

END=JAN-10 11:38

FILE NO.=627

STN NO.	COMM.	ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK		92158516710	005/005	00:00:39

-US DISTRICT COURT EDPA -

***** -CLERK'S OFFICE - *****

CMR

21

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROGER COUSTRY, Derivatively On Behalf
of CIGNA CORPORATION,

Plaintiff,

vs.

H. EDWARD HANWAY, WILSON H.
TAYLOR, MICHAEL W. BELL, CHARLES
R. SHOEMATE, LOUIS W. SULLIVAN,
PETER N. LARSON, JOSEPH NEUBAUER,
HAROLD A. WAGNER, CAROL COX
WAIT, MARILYN WARE, JANE E.
HENNEY, FRED HASSAN, ALFRED C.
DeCRANE, JR. and ROBERT P. BAUMAN,

Defendants,

-and-

CIGNA CORPORATION, a Delaware
corporation,

Nominal Defendant.

Civ. Action No. 2:05cv853

Honorable Cynthia M. Rufe

FILED

JAN 10 2006

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

STIPULATION OF VOLUNTARY DISMISSAL
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)

WHEREAS, Plaintiff filed this action on February 24, 2005;

WHEREAS, Defendants filed a Motion to Dismiss the Verified Amended Shareholder

Derivative Complaint (the "Motion") on May 5, 2005;

WHEREAS, the Motion was fully briefed on September 28, 2005;

CMR

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROGER COUSTRY, Derivatively On Behalf
of CIGNA CORPORATION,

Plaintiff,

vs.

H. EDWARD HANWAY, WILSON H.
TAYLOR, MICHAEL W. BELL, CHARLES
R. SHOEMATE, LOUIS W. SULLIVAN,
PETER N. LARSON, JOSEPH NEUBAUER,
HAROLD A. WAGNER, CAROL COX
WAIT, MARILYN WARE, JANE E.
HENNEY, FRED HASSAN, ALFRED C.
DeCRANE, JR. and ROBERT P. BAUMAN,

Defendants,

-and-

CIGNA CORPORATION, a Delaware
corporation,

Nominal Defendant.

Civ. Action No. 2:05cv853

Honorable Cynthia M. Rufe

Received
FILED

JAN - 9 2006

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

STIPULATION OF VOLUNTARY DISMISSAL
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)

WHEREAS, Plaintiff filed this action on February 24, 2005;

WHEREAS, Defendants filed a Motion to Dismiss the Verified Amended Shareholder
Derivative Complaint (the "Motion") on May 5, 2005;

WHEREAS, the Motion was fully briefed on September 28, 2005;

WHEREAS, Plaintiff, after reviewing Defendants' Motion, has decided to dismiss this action without prejudice;

WHEREAS, Plaintiff is submitting the declaration of Jeffrey P. Fink in support of this dismissal declaring that neither Plaintiff nor his counsel has received any consideration for this dismissal, and no future consideration has been promised; and

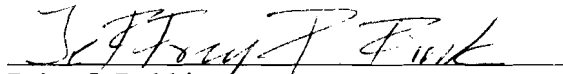
WHEREAS, this dismissal will not have any effect on the shareholders of CIGNA Corporation;

It is hereby stipulated and agreed by and between the parties hereto, subject to approval by the Court, as follows:

1. This action shall be dismissed without prejudice; and
2. Each party will bear its own costs.

DATED: January 6, 2006

ROBBINS UMEDA & FINK, LLP



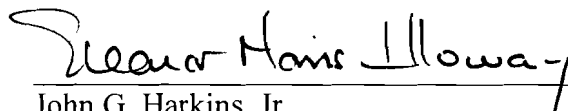
Brian J. Robbins
Jeffrey P. Fink
610 W. Ash Street, Suite 1800
San Diego, CA 92101
Telephone: 619/525-3990
Facsimile: 619/525-3991

THE WEISER LAW FIRM, P.C.
Patricia C. Weiser (PA #78295)
Robert B. Weiser (PA #81575)
121 N. Wayne Avenue, Suite 100
Wayne, PA 19087
Telephone: 610/225-2677
Facsimile: 610/225-2678

Attorneys for Plaintiff

DATED: January 9, 2005

HARKINS CUNNINGHAM LLP



John G. Harkins, Jr.
Eleanor Morris Illoway
2800 One Commerce Square
2005 Market Street
Philadelphia, PA 19103
Telephone: 215/851-6700
Facsimile: 215-851-6710

O'MELVENY & MYERS, LLP

Seth Aronson
Kristina Hersey
400 South Hope Street
Los Angeles, CA 90071
Telephone: 213/430-7486
Facsimile: 213/430-6407

Attorneys for defendants H. Edward
Hanway, Wilson H. Taylor, Michael W.
Bell, Charles R. Shoemate, Louis W.
Sullivan, Peter N. Larson, Joseph Neubauer,
Harold A. Wagner, Carol Cox Wait, Marilyn
Ware, Jane E. Henney, Fred Hassan, Alfred
C. Decrane, Jr., Robert P. Bauman and
nominal defendant CIGNA Corporation

SO ORDERED:



HONORABLE CYNTHIA M. RUFÉ
UNITED STATES DISTRICT JUDGE

DATED: Jan. 10, 2006

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROGER COUSTRY, Derivatively On Behalf
of CIGNA CORPORATION,

Plaintiff,

vs.

H. EDWARD HANWAY, WILSON H.
TAYLOR, MICHAEL W. BELL, CHARLES
R. SHOEMATE, LOUIS W. SULLIVAN,
PETER N. LARSON, JOSEPH NEUBAUER,
HAROLD A. WAGNER, CAROL COX
WAIT, MARILYN WARE, JANE E.
HENNEY, FRED HASSAN, ALFRED C.
DeCRANE, JR. and ROBERT P. BAUMAN,

Defendants,

-and-

CIGNA CORPORATION, a Delaware
corporation,

Nominal Defendant.

Civ. Action No. 2:05cv853

Honorable Cynthia M. Rufe

FILED

JAN - 9 2006

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

**DECLARATION OF JEFFREY P. FINK IN
SUPPORT OF THE STIPULATION OF VOLUNTARY DISMISSAL
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)**

I, JEFFREY P. FINK, declare as follows:

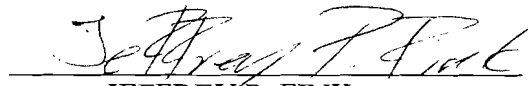
1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Robbins Umeda & Fink, LLP, one of the counsel

of record for Plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Neither Plaintiff, myself nor my firm have received, or expect to receive, any consideration for the dismissal of this action, and no future consideration has been promised.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of January 2006, at San Diego, California.


JEFFREY P. FINK